

S. LANE TUCKER
United States Attorney

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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:23-cr-00029-KFR
)	
Plaintiff,)	<u>COUNT 1:</u>
)	VIOLATION OF THE LACEY ACT
vs.)	Vio. of 16 U.S.C. § 3372(a)(2)(A) and
)	16 U.S.C. § 3373(d)(2)
EDWARD A. BUNDY)	
)	
Defendant.)	
)	
)	

I N F O R M A T I O N

The United States Attorney charges that:

G E N E R A L A L L E G A T I O N S

1. At all times relevant to this Information, Defendant EDWARD A. BUNDY was s a resident of the state Arkansas.
2. On or about April 25, 2017, the defendant EDWARD A. BUNDY submitted false record regarding his residency when he obtained an Alaska Resident

Hunting and Sport Fishing Combination License, in violation of AS 11.56.210 while not being a resident of the state of Alaska.

3. On or about August 4, 2017, the defendant EDWARD A. BUNDY submitted false record regarding his residency when he obtained a resident-only Registration Permit: RC835, in violation of AS 11.56.210, while not being a resident of the state of Alaska.

4. On or about August 17, 2017, the defendant EDWARD A. BUNDY harvested a bull caribou under a Registration Permit: RC835 while participating in a resident-only caribou hunt when he was a nonresident, in violation of: AS 16.05.330: Licenses, Tags, and Subsistence Permits and 5 AAC 85.025(a)(15): Hunting seasons and bag limits for caribou: Unit 20.

5. On or about April 27, 2018, the defendant EDWARD A. BUNDY had the hide of his unlawfully harvested caribou shipped via Federal Express from a tannery in Fairbanks, AK to his Newport, Arkansas residence.

RELEVANT LAW AND REGULATIONS

Federal Laws

6. Section 3372(a)(2)(A) of the Lacey Act makes it unlawful for any person to transport in interstate commerce, any wildlife taken in violation of any law or regulation of any State.

7. Section 3372(d)(2) of the Lacey Act make it unlawful for any person to make or submit any false record, account, or label for any fish, wildlife, or plant which has been, or is intended to be, transported in interstate commerce.

State of Alaska Laws and Regulations

8. Alaska Statute Title 11, Chapter 56.210 states a person commits the crime of unsworn falsification if, with the intent to mislead a public servant in the performance of a duty, the person submits a false written or recorded statement which the person does not believe to be true, (1) in an application for a benefit or, (2) on a form bearing notice, authorized by law, that false statements made in it are punishable, i.e. a hunting license, bear sealing certificate, furbearer sealing certificate, big game tag record.

9. Alaska Statute Title 16, Chapter 5.330(a)(2) makes it unlawful for a person to hunt without having the appropriate license or tag in actual possession.

10. Alaska Statute Title 16, Chapter 5.340(a)(15) makes it unlawful for a nonresident to take a big game animal without previously purchasing a numbered, non-transferable, appropriate tag issued under this paragraph. The tag must be affixed to the animal immediately upon capture and must remain affixed until the animal is prepared for storage, consumed or exported.

11. Alaska Statute Title 16, Chapter 5.420(a) states a false statement of a material fact in an application for a license, tag, or permit voids the license, tag, or permit for which the application is made.

12. Title 5, Alaska Administrative Code, Chapter 92.140(a) makes it unlawful to possess, transport, give, receive, or barter game or parts of game that the person knows or should know were taken in violation of Alaska Statute Title 16 or a regulation adopted under Alaska Statute Title 16.

COUNT 1

13. Paragraphs 1-12 are incorporated herein.

14. On or about April 27, 2018, in the State and District of Alaska and elsewhere, BUNDY did transport in interstate commerce wildlife, to wit, one bull caribou, which, in the exercise of due care, Bundy should have known was taken, possessed and transported in violation of Alaska state laws, in that EDWARD A. BUNDY killed a bull caribou in violation of the laws of the state of Alaska, to wit, that EDWARD A. BUNDY was not a resident of the state of Alaska and killed the bull caribou without the proper non-resident Alaska Department of Fish and Game hunting license and locking tag.

15. All in violation of Title 16, United States Code, §§ 3372(a)(2)(A) and 3373(d)(2).

DATED this 11th day of April, 2023, at Anchorage, Alaska.

S. LANE TUCKER
United States Attorney

s/ Steven E. Skrocki
STEVEN E. SKROCKI
Assistant U.S. Attorney